

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Criminal Action No. 18-73M
	:	
MELISSA EDGE,	:	
	:	
Defendant.	:	

**DEFENDANT'S MOTION FOR BAIL REVIEW**

Defendant, Melissa K. Edge, by and through her undersigned counsel, Janet Bateman, Assistant Federal Public Defender, respectfully moves this Court for an Order releasing her on certain conditions. Namely, Ms. Edge requests that this Court order her to participate in a residential substance abuse treatment program.

Ms. Edge was last before this Court for a detention hearing on April 19, 2018, at which time this Court ordered that Ms. Edge remain in pretrial detention. However, this Court stated that it would consider a proposal for Ms. Edge's release to an inpatient treatment program. The Office of the Federal Defender has identified two such programs willing and able to accept Ms. Edge. The first, the Connections Women's Residential Program in Wilmington, Delaware, has space available for her now and will assist in arranging for funding.<sup>1</sup> The program has a minimum stay of thirty days, with no fixed maximum. The Clinical Supervisor advised that the program includes group treatment programs and alcoholics and narcotics anonymous meetings. The program includes options for a "step-down" sober living arrangement and other intensive outpatient

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<sup>1</sup> Defense counsel confirmed with the Clinical Supervisor on May 9, 2018, that the program is holding a bed for Ms. Edge and understands that a hearing is scheduled for May 10, 2018.

programming, which is planned in advance of discharge. The staff would notify the Probation Department if Ms. Edge were to leave the program against medical advice.

The second program, Psychotherapeutical Services (“PSI”) in Dover, Delaware, is a similar program, with a minimum thirty-day inpatient portion, group treatment sessions and meetings, and transitional “step-down” programming upon discharge from inpatient treatment. A staff member from PSI contacted the Office of the Federal Defender on May 9, 2018, and stated that Ms. Edge is now at the top of PSI’s waitlist and that they will hold the bed for her until her hearing on May 10, 2018.

The defense submits that the availability of such treatment for Ms. Edge, in combination with her other personal characteristics that were presented in full at her initial detention hearing, represents an opportunity for Ms. Edge to receive the treatment that she desperately needs. Even if Ms. Edge receives a custodial sentence in her underlying case, she will one day be released to return to her family and community, and she has the opportunity now to begin receiving treatment, coping skills, and support that will be required for a chance at successful sober living. Such a program also represents an available condition for her release from pretrial detention that will reasonably assure the safety of the community and her appearance in court.

**WHEREFORE**, for these reasons and any other reasons that shall appear to the Court on or before Ms. Edge's bail review hearing on May 10, 2018, at 11:00 a.m., it is respectfully requested that the Court order Ms. Edge to be released to participate in an inpatient substance abuse treatment program.

Respectfully submitted,

Dated: May 9, 2018

/s/ Edson A. Bostic  
EDSON A. BOSTIC  
Federal Public Defender

By: /s/ Janet Bateman  
JANET BATEMAN  
Assistant Federal Public Defender  
District of Delaware  
800 King Street, Suite 200  
Wilmington, DE 19801  
[de\\_ecf@fd.org](mailto:de_ecf@fd.org)

Attorneys for Melissa Edge